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January 30, 2014

Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: San Jacinto River Waste Pits Superfund Site; Proposed Revision to Schedule for
Submittal of Revised Draft Feasibility Study
Project Number: 090557-01

Dear Gary:

This letter is submitted based on discussions during our call of January 28, 2014, regarding U.S. Environmental Protection Agency (USEPA) comments on the Draft Feasibility Study (FS) for the San Jacinto River Waste Pits Superfund Site. International Paper Company (IP) and the McGinnes Industrial Maintenance Corporation (MIMC) (collectively "the Respondents") are hereby requesting an extension to the schedule for submitting a revised Draft FS (Revised FS) in response to the comments.

USEPA's letter transmitting the comments, received by Respondents on January 20, 2014, directed Respondents to submit a Revised FS to USEPA within 30 days. Because dates in the current approved schedule for the Remedial Investigation/Feasibility Study (RI/FS) for the Site are based on business days rather than calendar days, Respondents have calculated the deadline to submit a Revised FS to be March 3, 2014. However, additional time is necessary for Respondents to address USEPA's comments and complete the necessary revisions and additions to the Draft FS for the reasons identified below:

- USEPA has issued more than 60 separate comments, each of which must be addressed in the Revised FS. A number of these comments involve complex technical issues

that require the consideration of various engineering, modeling, and scientific principles.

- USEPA is requiring that a broad suite of new remedial alternatives be developed for the area south of I-10 and that an additional remedial alternative be developed for the northern impoundments. In preparing the Draft FS, the Respondents worked collaboratively with USEPA to develop a common understanding of the range of remedial alternatives to be included in the Draft FS. The range of alternatives was iteratively developed with USEPA over the course of many months. The current schedule did not contemplate the need to develop additional remedial alternatives in response to USEPA comments. Properly developing and evaluating additional remedial alternatives is a complex undertaking that will require more time than the current schedule allows in order to assure the next iteration of the FS is technically complete and meets USEPA's needs.
 - As discussed during our conversation on January 28, 2014, detailed new evaluations and further discussions with USEPA regarding the new northern impoundment remedial alternative are likely to be necessary. Variations in the chemistry of the materials within the northern impoundments, variations in the bathymetry within those areas, and the potential volumes of materials considered for removal or treatment as part of this new alternative will need to be fully understood before Respondents are able to proceed with the extensive work required to develop this new alternative. A meeting is currently scheduled with USEPA for February 4, 2014 to further discuss these issues.
 - Additional discussions and collaboration with USEPA will be necessary in order for Respondents to develop an appropriate set of remedial alternatives for the area south of I-10. An initial meeting has been scheduled with USEPA for January 31, 2014 to begin discussion of these issues. Further meetings may be required.
 - Finally, additional modeling is necessary to address several of USEPA's comments related to the northern impoundments, including the development of an additional remedial alternative for the northern impoundments. Model setup, calibration, and computation time alone requires several weeks. Assessing the model output and incorporating the results into the FS will also require additional time.
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Based on the above, the Respondents request 60 calendar days from receipt of USEPA's comments to prepare and submit the Revised FS. Under this extended schedule, the Revised FS would be submitted to USEPA on March 21, 2014, rather than March 3, 2014.

Thank you for your consideration of the Respondents' request. Please let me know if you have any questions regarding this proposed schedule modification.

Sincerely,



David C. Keith
Project Coordinator
Anchor QEA, LLC

Cc: Anne Foster, USEPA
Phil Slowiak, International Paper Company
Dave Moreira, McGinnes Industrial Maintenance Corporation
Jennifer Sampson, Integral Consulting Incorporated
